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August 27, 1998

Ms. Magalie Roman Salas Secretary Federal Communications Commission 1919 M. St., NW Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Re:

Ex Parte Meeting: CC Docket No. 94-102

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206 (1992), I hereby notify the Commission that Nikoli Leung, Jonas Neihardt, Jennifer McCarthy, and I met with the following members of the Commission staff on August 26, 1998: Nancy Boocker, Pamela Gregory, Dale Hatfield, Marty Liebman, Elizabeth Lyle, and Ron Netro. We discussed technical issues pertaining to TTY user accessibility to digital wireless handsets, as summarized in the attached materials, and the FCC's upcoming compliance date for TTY E911 service.

Please direct any inquiries concerning this matter to me at 202-530-3921.

Respectfully submitted

Kévin J. Kellev

Senior Vice President, External Affairs

Pamela Gregory
Dale Hatfield
Marty Liebman
Elizabeth Lyle
Ron Netro

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MABCDE

# Systems Requirements Document For Circuit Switched Data

**Release D.00.00.01** 

May 20, 1998

**TTY Forum** 

## **Revision History**

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|----|------------|---|----------|--|
| 1  | D 00.00.00 | 5/15/98                                 | B.B.     | initial version reviewed by CTIA   |
| 2  | D 00.00.01 | 5/20/98                                 | B.B.     | distribution to TTY Forum for comments   |
| 3  |            |   |          |  |
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#### D00.00.00 numbering scheme instructions -

- 1) D 00.00.00 to D.00.00.99 is used for initial draft versions
- 2) D 01.00.00 is used for the first version
- 3) D 01.00.01 to D01.00.99 is used for minor changes on version D 01
- 4) D 02.00.00 is reserved for major changes (major sections of document revised, added, deleted)
- 5) D 02.00.01 to D02.00.99 is used for minor changes on version D 02
- 6) R.01.00.01 is the first released variant.

## 1. Acronyms and Definition of Terms

BSC Base Site Controller

CO Central Office

CSD Circuit Switched Data

DTE Data Terminal Equipment

ERP Effective Radiated Power

FRU Field Replaceable Unit

IWF Interworking Function

LAN Local Area Network

MS Mobile Station

MSC Mobile Switching Station

MS Mobile Station

MSO Mobile Switching Office

PCM Pulse Code Modulation

RLP Radio link protocol

SRD Systems Requirements Documents

SU Subscriber Unit

TCH Traffic Channel

TDD Telecommunications Device for the Deaf

#### 2. Introduction

#### 2.1 Purpose

Circuit switched data (CSD) is a service which is complementary to the existing suite of Wireless Voice and Data services including telephone interconnect, Short Message Service (SMS) and Packet Data. CSD enables subscribers to directly connect a laptop or facsimile device to their Multi-Service portable for remote wireless modem and fax data communications to wireline data services.

The inter-Working Function (IWF) platform contains the hardware and software elements required to facilitate CSD service through each carrier's Mobile Switching Center (MSC).

The purpose of this document is to define the requirements for circuit switched data (CSD) and the Inter-Working Function (IWF).

#### 2.2 Scope

This document attempts to define product feature and functional requirements for the Circuit Switched Data IWF across wireless infrastructures.

Circuit switched data is envisioned as a service that would be integrated onto wireless platforms to complement the existing suite of voice and data services.

Circuit switched data service enables a wide range of applications, and can be combined with Packet Data and SMS to fully meet deaf and hard of hearing data communication needs.

#### 2.2.1 Immediate Customer Requirement

The wireless community's requirements for circuit switched data are driven by their interest in providing the capability for the deaf and hard of hearing community to use circuit switched data if they so desire. This will be accomplished by connecting the deaf and hard of hearing subscriber's computers via CSD. CSD service will also be made universally available to all subscribers with properly equipped and enabled subscriber units.

The development of the Circuit Switched Data IWF to meet the immediate Wireless Service Provider data requirements will also provide a universal IWF platform with the features and flexibility necessary to satisfy additional customers and markets.

#### 2.3 Goals

The goals satisfied by a product that meets the requirements of this document include:

- Enabling effective circuit switched data for the deaf and hard of hearing community.
- Develop an IWF platform that provides the following benefits to customers:
  - allow customers the additional benefits of using CSD
  - increased number of T1/E1 channels per platform
  - flexible platform allowing easy feature addition and channel expansion with minimum hardware changes
  - IWF platform must be functionally backward compatible to the previously installed carrier base.

#### 3. Customer and Service Provider Requirements

#### The customer functionality expectations include:

- Enables asynchronous, non-transparent Facsimile and Data Services to a wireless network containing an MSC.
- No impact to existing subscribers.
- Supports Group 3 Fax Teleservice and a wide range of 300 33,600 bps modem data.

#### The Service Provider expectations include:

- 24/30 IWF T1/E1 data ports as a minimum configuration.
- Expandable in 24/30 IWF T1/E1 data port increments.
- Each IWF will contain a redundant -48Vdc internal power supply.

#### 3.1 Customer Statement

Not Available

## 3.2 Operational Scenarios for Circuit Switched Data

#### 3.2.1 CSD System Overview:

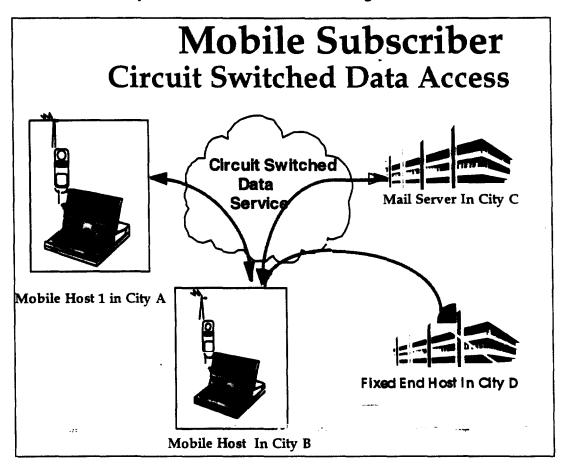
Circuit Switched Data (CSD) is a service which is complementary to the existing suite of Voice and Data services including telephone interconnect, Short Message Service (SMS) and Packet Data. CSD enables subscribers to directly connect a laptop or facsimile device to their Multi-

Service portable for remote wireless modem and fax data communications to wireline data services.

The Interworking Function (IWF) contains the hardware and software element that provides the rate adaptation and protocol conversion between a land destination Public Switched Telephone Network (PSTN) and the network for both data and fax services. The IWF is required at each Mobile Switching Center (MSC) to support circuit switched data.

#### 3.2.2 User's Perspective

From the user's perspective, the circuit switched data system provides delivery of information to and between mobile subscribers. Circuit switch data subscribers can maintain access to information resources from anywhere in the nation where coverage is available.



After a user powers on their Mobile Station (MS) and TDD or specialized terminal equiupment, the user initiates the circuit switched data session by dialing a remote TDD or FAX device. Once this step is completed, users may send and receive information to desired hosts and other mobile users as needed through standard applications. No additional "connection" action is required by the user other than what is required by the Fixed End Operating System for activating applications.

#### 3.2.3 Application Perspective

In the context of the network, a mobile subscriber communicates through a mobile host. A **Mobile Host** is the combination of a Mobile Station and a Data Terminal Equipment (DTE). The Mobile Station is the user radio device that communicates with the infrastructure. Laptops and specialty terminals are referred to as DTE.

The Local Area Network (LAN) servers and hosts accessed through the Network are referred to as Fixed End Hosts.

The circuit switched data system provides information delivery by supporting TDD, fax and modem applications between Mobile Hosts and Fixed End Hosts or other Mobile Hosts.

#### 3.2.3.1 Fixed End Host Initiated Communications

A customer's Fixed End Host, internetworked with the circuit switched data system, can send TDD transmissions, other modern transmissions, and facsimile to any Mobile Host within the coverage area that has it's DTE powered on and has registered with the circuit data System. Fixed End Hosts are not aware of the Mobile Host's actual location and do not need any special software to support mobility.

#### 3.2.3.2 Mobile Host Initiated Communications

A Mobile Host within the coverage area of the network can send TDD data, standard modem data, and Facsimile to any Fixed End Host internetworked with the circuit switched network.

A Mobile Host can appear to Fixed End Hosts as part of a LAN and have full access to existing LAN services available. This may include file server access, e-mail, and other applications supported by the Fixed End Host Operating System.

## 4. Assumptions and Observations

During the time this SRD is constructed, reasonable assumptions are placed on the network, subscriber, and customer which are important to document. These assumptions convey the base or foundation upon which the SRD's requirements are created and defined. Some of these assumptions help portray the expected conditions at the time of feature deployment. More define expected customer behaviors. Others define features that will not be impacted or supported by this feature (i.e. negative requirements). These assumptions, if not held true, would impact the SRD requirements, either by making them incorrect, insufficient or not workable.

## 4.1 Applicable Call Model

The IWF Call Model is as follows:

- 180 sec hold time
- 0.005 Erlangs per IWF call
- 0.1 IWF Blocking Rate
- 0.1 Calling Rate

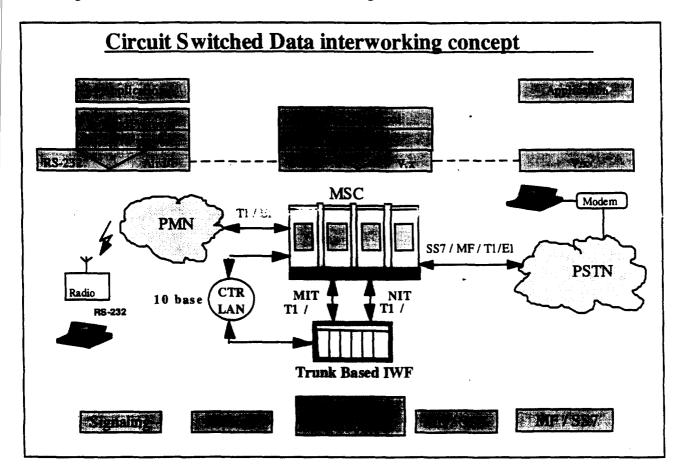
#### 4.1.1 Traffic Model

A 24 T1 port - IWF will support approximately 2,920 CSD subscribers based upon the Call Model above. If the user call pattern differ from the above model, fewer overall subscribers may be supported.

#### 4.2 Approach

Successful development of the IWF is the critical first step required to provide a multi-access platform that enables the addition of customer features and functions that are needed by the deaf and hard of hearing community. The approach is to employ an X.86 based platform that incorporates "off the shelf" hardware and software components to leverage commercial product cost curves and multi-vendor availability.

The diagram below shows the network including the Circuit Switched Data elements.



# The minimum elements required to be added to an network to implement CSD as shown above include:

- Trunk based IWF Unit 24/30 T1/E1 ports minimum capability
- A Mobile Interface Trunk (T1/E1) and Network Interface Trunk (T1/E1)
- MSC/IWF Control 10BaseT ethernet LAN external interface equipment
- IWF software

#### The required infrastructure software modifications include:

- MS UNITS: Must be equipped and enabled for data
- Wireless Infrastructure: Must support CSD and air data interface framing.
- MSC: Requires new call setup elements including IWF control functionality, mobile termination number translation, and new billing fields for existing carrier billing systems.

## 5. Numbered Requirements

## 5.1 System Requirements

The following paragraphs describe the CSD IWF system requirements.

#### 5.1.1 Function & Feature Requirements

#### R1 Backward Compatible Functionally and Features

The IWF will not impact existing subscribers.

#### **R2** Supports TDD Service

The IWF is required to enable TDD devices connected to a network containing an MSC.

#### **R3** Supports Group 3 Fax

The IWF at each Mobile Switching Center (MSC), is required to be capable of supporting Circuit Switched FAX with Group 3 compatibility.

#### **R4** Supports Asynchronous Non-Transparent Modem Data Standards

The IWF is required to support the following asynchronous non-transparent modem types: V.21, V.22, V.22bis, V.23, V.27ter, V.29 and V.32, V.32bis, V.33, V.34, Bell 212A, Bell 103 as well as V.42bis, data compression, V.42 and MNP level 2-5 error control, V.25bis autodialer, and V.54 loop backs. Data mode full duplex, synchronous and asynchronous, operation at 300, 1200, 2400, 4800, and 9600 Data Carrier Equipment (DCE) data rates must also be supported.

#### R5 Provides 24/30 T1/E1 MCS/IWF ports minimum capability

The IWF should provide 24/30, T1/E1, ports for a minimum configuration.

#### R6 Expandable in 24/30 Port Increments - 48/60 ports per Chassis

The IWF should be expandable in expectation of the future increase in circuit data usage.

#### R7 Redundant -48Vdc Power Supplies Within the IWF Chassis

The IWF should contain internal redundant -48Vdc power supplies.

## 5.2 Network Management Requirements

#### **R8** Communications Frequency Band Compatibility:

The IWF must be compatible with the RF system.

#### **R9 MSC Compatibility Requirements:**

The IWF interfaces directly with the MSC only; therefore the MSC controls the insertion and removal of an IWF Element to and from the network path of a data call. The CSD IWF System requires new MSC call setup elements including IWF control functionality, mobile termination number translation, and new billing fields for existing carrier billing systems.

#### **R10** Mobile Link Compatibility Requirements:

The Mobile Link function must support the Radio Link Protocol (RLP) interworking

between a Mobile Station and the IWF to transport data over the air interface.

#### R11 Mobile Interface Trunk (MIT) Compatibility Requirements:

#### R12 Network Interface Trunk (NIT) Compatibility Requirements:

The network-side function supports the protocol interworking between the IWF and a fixed network. The NIT-moves the 64Kbps Pulse Code Modulation (PCM) digital representation of the subscriber/host fax/modem data to/from the PSTN. The IWF modems perform the PCM encoding/decoding and places the data into the appropriate DSO channel. The MSC connects to the Network-side Interworking function over a Network-side IWF Trunk. The IWF/MSC NIT interface must be a standard T1, PCM 24 channel interface.

#### 5.3 Subscriber Provisioning Requirements

The MS formats the data stream from the DTE for transmission over the radio interface. This involves a number of steps, depending on the speed and type of data supplied. The MS also performs the user side of the Radio Link Protocol (RLP) and forwards the data from the network to the connected DTE.

The system operator is responsible for configuring subscriber classes to permit IWF CSD functionality.

#### R13 Subscriber DTE interconnect Cable and Peripheral Requirements

An adapter cable for the data-capable subscriber unit, and a personal computer is required.

## 5.3.1 Provisioning Requirements

#### **R14 Subscriber Enabling**

Subscriber units must be equipped and enabled for data. This enabling is done through the service provider interface to the MSC-HLR..

## 5.3.2 Interaction with Existing or New Service Options

#### R15 SMS

Short messages can be delivered to the mobile during circuit switched data. However, short message notification is not performed until after completion of the CSD call.

#### **R16** Interconnect voice

Interconnect voice calls will not be delivered to the subscriber during CSD calls.

#### **R17** Call Forwarding

Call Forwarding for CSD must work the same as voice except that it can be provisioned separately from voice. (separate activation status and call forwarding number can be associated with each call forwarding type, separate from voice). Note data call forwarding activation/deactivation must be performed by the system operator; it cannot be done at the mobile as can voice call forwarding.

#### 5.4 Mobility Requirements

#### **R18 Handoff**

A data call will utilize a traffic channel (TECH), like voice calls do, therefore the radio resource (RR) layer acts no differently. A handoff may result in a momentary loss of communication signal. During a non-transparent data call, radio link protocol error correction should be used between the MS and the IWF to help reduce the data loss by retransmitting the lost packets.

#### 5.5 Billing Requirements

There are no new structured records or enhancements to the fixed part of the structured records for CSD. New modules added to MO and MT records include bearer, teleservices, and data service information. Additionally, the location and channel information module is enhanced.

**Grivroww** 

## **CDMA Solutions for TTY**

Nikolai Leung

**Grivitovi** 

# Outline

- The voice-based approach
- The data-service approach
  - user requirements
  - description
  - challenges
- Policy Considerations

**Girico** 

## **Voice Services**

- Wireless digital technologies provide improved voice quality with higher capacity (more users) using vocoders
- Digital voice services are specifically optimized for speech

**Giivico** 

## Problems with Voice-Based TTY

- Standard voice services can not transmit TTY data reliably
  - Character error rates of 8-12% for CDMA
  - Frame erasure rates for voice services result in poor TTY data performance
  - CDMA variable rate vocoder causes TTY signal distortion
  - Noise suppressors can attenuate TTY signal due to false noise detection

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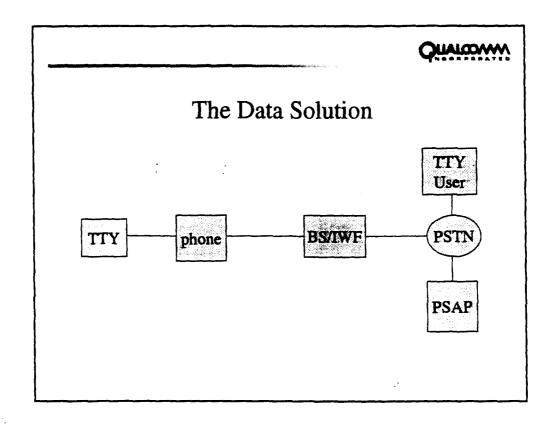
## Modifying Voice Services for TTY

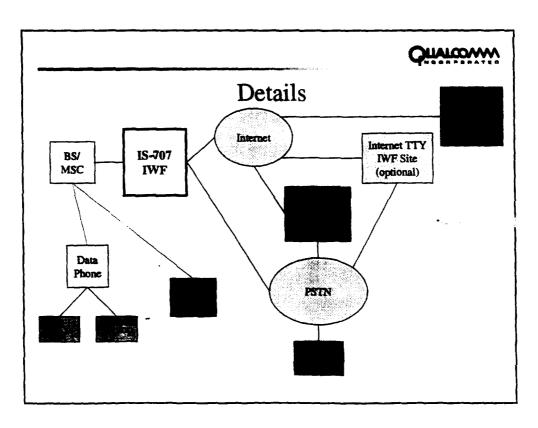
- QUALCOMM is investigating improvements and performing field tests
- Other industry members are also proposing vocoder improvements
- But these improvements will require changes to the infrastructure, standards, and handsets
- Such system-wide changes can take 18-24 months to standardize and implement

**Orivico** 

## The Data Service Solution

- TTY communication is inherently a data service
- CDMA data services can relay TTY data reliably (unlike voice-based services); achieves same performance as wireline TTY communication
- TTY User Community has made a formal request for data service (see Standards Request Document presented at the CTIA TTY Forum)
- CDMA data service is already standardized (IS-707) and is currently being implemented and field tested by manufacturers





**Grivicoww** 

## Diagram Details

- PSTN: Public Switched Telephone Network
- BS/MSC: Base Station/Mobile Switching Center
- IWF: Inter-working Function (provides TTY modem functionality to the PSTN)
- Internet TTY IWF Site (common site for TTY modem pool)
- Smart Phone Integrated phone and digital organizer (has text display and input)

**Ginicoww** 

# Advantages of Data Services

- Provides very reliable TTY communication (especially important for E911 calls)
- Provides other data services for the TTY community: fax and direct access to the internet without special modems
- Allows use of advanced portable TTY solutions such as smart phones

**Grivico** 

## Advantages of Data Services (2)

- Provides data features to all users (not just TTY);
   carriers are already planning to deploy basic data services
- Has industry-wide market value: cost impact on carriers is significantly less than implementing a TTY-only solution based on voice services
- Already standardized as IS-707 and basic services are being implemented and field tested

**Giritoww** 

## Data Solution: Challenges

- Deploy IWF's in network
  - Carriers are planning this for 1Q-3Q of '99
  - QUALCOMM is already performing field trials for basic data services with some carriers
  - QUALCOMM is conducting TTY Data testing in San Diego
- 3COM needs to upgrade software to support TTY in their IWF's
  - QUALCOMM is collaborating with 3COM on technical issues
  - 3COM needs contractual requirements from carriers

**Giritoww** 

## Data Solution: Challenges (2)

- Interface between TTY device and phones (digital vs. analog interface).
  - QUALCOMM is working with TTY manufacturers on developing TTY terminals with digital interfaces
  - User community is willing to have retrofit of TTY devices
  - Possible to support analog interface but requires chipset changes in handsets

**Girroww** 

## Data Solution: Challenges (3)

- Voice-Carry-Over (VCO)
  - Major infrastructure changes to support VCO over data service (requires service switching)
- Educate users and carriers on the technical details, availability, and services
  - White papers
  - Driving the work in standards by identifying key issues (TR45.5)
  - Educating carriers and other manufacturers (CDMA Development Group and other industry fora)
  - Working with the CTIA

**GINIOWW** 

# **Policy Considerations**

- QUALCOMM and wireless industry are working hard to understand and meet TTY user needs
- Additional time is needed to complete adequate testing and to formulate intelligent strategies
- Certain features and requirements should be reconsidered given the test results and technical limitations